

# **EXHIBIT C**

On Tue, Jun 4, 2024 at 11:16 AM Timothy Bauman <[tbauman@baumanlawgroup.com](mailto:tbauman@baumanlawgroup.com)> wrote:

If we have to amend the complaint to dismiss them, we will not agree to that. As stated in our letter, we believe they are adequately pled.

Timothy Bauman



141 Parkway Road, Suite 9  
Bronxville, New York 10708  
(main) 914.337.1715  
(fax) 914.361.4008

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**From:** Stuart Kagen <[skagen@kcbfirm.com](mailto:skagen@kcbfirm.com)>  
**Sent:** Tuesday, June 4, 2024 11:12 AM  
**To:** Timothy Bauman <[tbauman@baumanlawgroup.com](mailto:tbauman@baumanlawgroup.com)>  
**Subject:** Re: Status?

**So how will you dismiss these claims you said you would dismiss?  
Your position doesn't seem to make sense.**

Stuart Kagen

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Kagen, Caspersen & Bogart PLLC  
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(646) 304-7879 (facsimile)

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On Tue, Jun 4, 2024 at 11:09 AM Timothy Bauman <[tbauman@baumanlawgroup.com](mailto:tbauman@baumanlawgroup.com)> wrote:

Stuart,

We do not believe that it is appropriate to amend the complaint at this time. As stated in our letter we believe we have appropriately pled all of our claims. Amendment is neither needed nor would it serve any efficiency. Given all of the delays we are hoping to keep things moving forward in a timely manner.

Please let us know if you intend to proceed with a motion to dismiss.

Timothy Bauman

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-----Original Message-----

From: Stuart Kagen <[skagen@kcbfirm.com](mailto:skagen@kcbfirm.com)>  
Sent: Monday, June 3, 2024 7:35 PM  
To: Timothy Bauman <[tbauman@baumanlawgroup.com](mailto:tbauman@baumanlawgroup.com)>  
Subject: Status?

Tim, are you amending? Please let me know today what you're doing

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